

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Warren Steel Holdings - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #4
Progress
Warren Steel Holdings
C5AV
Warren, OH
Latitude: 41.2629796 Longitude: -80.7990185

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From: Stephen Wolfe, OSC
Date: 5/4/2018
Reporting Period: 04/30/2018 through 05/04/2018

1. Introduction

1.1 Background

Site Number:	C5AV	Contract Number:	
D.O. Number:		Action Memo Date:	2/20/2018
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	4/24/2018	Start Date:	4/24/2018
Demob Date:		Completion Date:	
CERCLIS ID:	OH0011207	RCRIS ID:	OHD066060608
ERNS No.:		State Notification:	yes
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time Critical Removal Action

NOTE: POLREPS 1 and 2 were for emergency response actions (initial and final) that occurred 04/27/17 through 6/02/2017

1.1.2 Site Description

WSH is a former 400-acre steel manufacturing facility. The site was in operation from at least the 1940s, and all operations official ceased at the facility in January 2016. EPA is gathering all drums and containers of hazardous waste that was abandoned at the facility as well as inspecting approximately 100 transformers for possible pcb oil/threat to waterway.

1.1.2.1 Location

4000 Mahoning Street, Warren, Ohio.

1.1.2.2 Description of Threat

EPA and Ohio EPA documented abandoned drums/totes/other containers containing hazardous waste (corrosives, pcb oil, used oil) at the site. EPA performed a site assessment on April 27, 2017 and documented that some of the material had a pH of 1-2 standard units and 14 standard units. A sample of oil from a pit on the site tested positive for pcbs at 90 ppm. Labeling is present on the majority of the containers indicating sulfuric acid, caustics, and water treatment chemicals.

Approximately 100 transformers are present on site, half of which are located near the bank of the Mahoning River. No data is available on whether or not the transformers contain oil/pcb oil. EPA will

investigate the transformers as part of the Removal Action and handle appropriately.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Information from Ohio EPA and the EPA site assessment indicated the presence of caustic material (acid and bases) as well as used, oil, and pcb contaminated oil. The EPA site assessment noted the presence of possible asbestos containing materials; however, asbestos removal is not a part of this removal action. EPA will address any loose asbestos if the material inhibits the ability to gather the containers of hazardous waste.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

This is a Time Critical Removal Action focusing on the removal of drums and other containers of hazardous waste. Electrical Transformers will also be inspected to determine if they are full of oil/pcb oil.

2.1.2 Response Actions to Date

On Monday, April 30, 2018 ERRS continued to collect drums and other containers from the site. Suspect ACM material was sampled and delivered to a laboratory along with air samples collected on Friday, April 27.

On Tuesday, May 1, 2018, ERRS continued to collect drums and other containers from the site. A representative from a transformer service company that used to maintain the transformers for WSH was on site and provided EPA with information concerning the transformers (including some pcb sampling data). ERRS began sampling larger containers that can not be moved for HAZCAT analysis. ACM was removed (wetted, double bagged) from the top of totes prior to sampling/moving. Asbestos analytical results were received and the bulk material collected on Monday April 30th was non-asbestos. Air sample analysis for worker protection indicated fibers at .019 fiber/cc (OSHA PEL for fibers is 0.1 fiber/cc). TEM analysis was also performed on the air samples to determine if the fibers were asbestos and the fibers and the results were negative.

On Wednesday May 2, 2018, ERRS continued to collect drums and other containers from the site. ERRS began sampling larger containers that can not be moved for HAZCAT analysis and began sampling staged containers for HAZCAT analysis. ERRS also opened vacuum boxes of K061 waste to determine the contents (representative from the company who performed the work for WSH indicated the material sets up like concrete and incurs a large cleaning fee). The material was a loose powder, and samples were collected for disposal analysis. Locks were cut off a CONEX box that had "radioactive material" stickers, and no radioactive material was found (monitored with a gamma meter and visual inspection). The stickers were painted over and a new lock was put in place.

On Thursday May 3, 2018, ERRS continued to collect drums and other containers from the site. ERRS began sampling larger containers that can not be moved for HAZCAT analysis and continued sampling staged containers for HAZCAT analysis. ERRS placed sorbent material on thin layers of oil discovered in machine pits.

On Friday, May 4, 2018, ERRS continued to collect drums and other containers from the site. ERRS began sampling larger containers that can not be moved for HAZCAT analysis and continued sampling staged containers for HAZCAT analysis. Locks were removed from buildings for access and new locks were put in place once all chemicals were removed from the building.

Daily air monitoring (particulate) is being performed by START in dusty areas. Acid gas monitoring and general air monitoring (MultiRAE) is being performed during drum/container sampling.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Ongoing.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

Continue gathering all drums and containers, sample/profile and dispose
Investigate transformers
Investigate options for containerized K061 wastes

2.2.1.1 Planned Response Activities

gather/sample/dispose of hazardous materials located in drums/totes and other containers throughout the site
investigate (sample for pcbs) and drain transformers located on site

2.2.1.2 Next Steps

Meet with Ohio Edison (Electric Company) to confirm transformers are de-energized.
Receive bids for subcontracted transformer sampling (~100)

2.2.2 Issues

The bay doors on two buildings cannot be opened. The doors need to be opened in order to remove the larger containers of material (Caustic solution) in totes and tanks (Filter building) and to be able to remove drums from 15 foot high shelving (Warehouse building). ERRS contacted several vendors to inquire what it would take to get the door manually operational and one contractor was on site and has not returned any follow up calls. ERRS is exploring other options up to and including cutting through the door in order to remove the chemicals.

2.3 Logistics Section

ERRS provided all logistics for the site

2.4 Finance Section

2.4.1 Narrative

EPA Branch Chief verbally authorized a \$50,000 ceiling for the Emergency Removal.

An Action Memo was signed on February 2, 2018 for the time critical removal action with a ceiling limit of \$1,878,830 for removal actions. A delivery issue was issued to ERRS for \$300,000 to begin response actions.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$300,000.00	\$95,000.00	\$205,000.00	68.33%
TAT/START	\$33,850.00	\$9,250.00	\$24,600.00	72.67%
Intramural Costs				
Total Site Costs	\$333,850.00	\$104,250.00	\$229,600.00	68.77%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

Safety briefings are held before the start of every workday and at the end of the work day.

Air samples (personnel and area) were collected over a course of two days of site work. All samples indicated a presence of fibers (high of 0.019 fiber/cc on a laborer); however all results were below the OSHA PEL of 0.1 fiber/cc. Due to the confirmed presence of ACM material in one bulk samples, TEM analysis was run on one set of personnel air samples (highest result) and no asbestos fibers were detected.

As a precaution (and due to dusty environment) the HASP has been amended to include APR use during general activities throughout the site as well as the use of N95 "dust" masks.

2.5.2 Liaison Officer

OSC Steve Wolfe

2.5.3 Information Officer

OSC Steve Wolfe

3. Participating Entities

3.1 Unified Command

OSC Steve Wolfe

3.2 Cooperating Agencies

OSC Steve Wolfe

4. Personnel On Site

1 EPA
1 START
7 ERRS

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report
response.epa.gov/WSH

6.2 Reporting Schedule

7. Situational Reference Materials

NCP and CERCLA.

